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*Attorneys for Defendants,*

**HARTFORD FIRE INSURANCE COMPANY and  
SENTINEL INSURANCE COMPANY, LIMITED**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

FOUNDER INSTITUE  
INCORPORATED, a Delaware  
Corporation,  
Plaintiff,

vs.

HARTFORD FIRE INSURANCE  
COMPANY, a corporation doing  
business in California; SENTINEL  
INSURANCE COMPANY, LIMITED,  
a corporation doing business in  
California; and DOES 1 through 50,  
inclusive,  
Defendants.

Case No.: 5:20-cv-04466

**STIPULATION TO EXTEND TIME  
TO RESPOND TO THE FIRST  
AMENDED COMPLAINT**

Judge: Mag. Judge Nathanael Cousins  
Dept: 5  
FAC Served: June 8, 2020  
Current Response Deadline: July 13,  
2020  
New Response Deadline: July 27, 2020

1                   **TO THE CLERK OF THE COURT AND ALL PARTIES OF**  
2                   **RECORD:**

3                   Pursuant to Local Rule 6-1(a) of the United States District Court for the  
4 Northern District of California, Plaintiff Founder Institute Incorporated  
5 (“Plaintiff”) and Defendants Hartford Fire Insurance Company and Sentinel  
6 Insurance Company, Ltd. (“Defendants”) (collectively the “Parties”), by and  
7 through their respective counsel, hereby stipulate and agree as follows:

8                   WHEREAS, on April 16, 2020, Plaintiff filed a Complaint against  
9 Defendants in the Superior Court of California, County of Santa Clara, Case No.:  
10 20CV366110 and on May 22, 2020, Plaintiff filed a First Amended Complaint  
11 (“FAC”) (ECF No. 1-1);

12                  WHEREAS, Defendants were served with the FAC on June 8, 2020;

13                  WHEREAS, Defendants filed a Notice of Removal to the Northern District  
14 of California on July 6, 2020 (ECF No.1);

15                  WHEREAS, Defendants’ current deadline to respond to the FAC is July 13,  
16 2020 (*See* FRCP 81(c)(2));

17                  WHEREAS, on July 9, 2020, counsel for the Parties met and conferred, and  
18 agreed to extend the time for Defendants to respond to the FAC by two weeks up  
19 to and including July 27, 2020;

20                  WHEREAS, the interests of justice and judicial efficiency will be furthered  
21 by continuing the date by which Defendants must respond to the FAC;

22                  WHEREAS, by stipulating to the extension herein will not alter the date of  
23 any event or any deadline already fixed by Court Order;

24                  NOW, THEREFORE, the Parties, by and through their respective  
25 undersigned counsel, hereby stipulate that the time for Defendants to respond to  
26 Plaintiff’s FAC in this action shall be extended up to and including July 27, 2020.

27                  ///

28                  ///

**IT IS SO STIPULATED.**

DATED: July 10, 2020

STEPTOE & JOHNSON LLP

By: /s/ Melanie A. Ayerh  
Anthony J. Anscombe  
Sarah D. Gordon  
Melanie A. Ayerh

*Counsel for Defendants,*  
HARTFORD FIRE INSURANCE  
COMPANY and SENTINEL INSURANCE  
COMPANY, LIMITED

DATED: July 10, 2020

SANJIV N. SINGH, A PROFESSIONAL  
LAW CORPORATION

By: /s/ Sanjiv N. Singh  
Sanjiv N. Singh

*Counsel for Plaintiff,*  
FOUNDER INSTITUTE  
INCORPORATED

**ATTESTATION**

In accordance with Civil Local Rule 5-1(i)(3), I, Melanie A. Ayerh, have  
obtained concurrence in the filing of this document from the other signatory listed  
here.